

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

In Re:	)	
	)	
Stephanie T Henry, <i>Debtor</i>	)	
	)	Case No. 23-41028-659
U.S. Bank National Association, <i>Creditor</i>	)	
	)	Chapter: 13
vs.	)	
	)	
Stephanie T Henry, <i>Debtor</i>	)	

**SECURED CREDITOR'S OBJECTION TO  
CONFIRMATION OF CHAPTER 13 PLAN**

COMES NOW, U.S. Bank National Association, its successors or assigns, a secured creditor and objects to the Chapter 13 Plan for the following reasons:

1. The secured creditor is the holder of a promissory note in the principal sum of \$80,514.00, together with interest, secured by a lien on the real property of the Debtor located at 4631 Varrelmann Ave, Saint Louis, MO 63116.
2. The Debtor's Plan lists the arrearage to U.S. Bank National Association at \$5,000.00.
3. The arrearage expected to be listed in the Proof of Claim is approximately \$11,360.67.
4. The Debtors' Plan underestimates the arrearage in violation of 11 U.S.C. 1322(b)(2), which may also affect the Plan's feasibility.

**WHEREFORE**, having fully prayed, Creditor requests that confirmation of the proposed Chapter 13 plan be denied, and for such other and further relief as the Court deems proper.

SOUTHLAW, P.C.

*s/ Hunter C. Gould*

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Steven L. Crouch, (MBE #37783; EDMO #2903; KSFd #70244)  
Daniel A. West (MBE #48812; EDMO #98415; KSFd #70587)  
Wendee Elliott-Clement (MBE #50311; KS #20523)  
Hunter C. Gould (MBE #65355; #KSFd #78608)  
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**ATTORNEYS FOR CREDITOR**

**CERTIFICATE OF MAILING/SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on April 6, 2023, with the United States Bankruptcy Court, and has been served on the parties in interest via email by the Court's CM/ECF System as list on the Court's Electronic Mail Notice List.

- **Diana S. Daugherty** standing\_trustee@ch13stl.com, trust33@ch13stl.com
- **Office of US Trustee** USTPRegion13.SL.ECF@USDOJ.gov
- **William H. Ridings** ridingslaw2003@yahoo.com

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below on April 6, 2023.

Stephanie T Henry  
4631 Varrelmann Ave  
Saint Louis, MO 63116

**RESPONDENTS**

SOUTHLAW, P.C.

*s/ Hunter C. Gould*

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